

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

IN RE:		§	District Court Case No. 2-09CV-199-J
RALPH LYLE CRUM		§	(Appeal from Bankruptcy Case No.
		§	08-20297-RLJ-7)
	Debtor	§	
		§	
RALPH LYLE CRUM		§	
	Appellant	§	
vs.		§	
Kent Ries, Trustee and Randi Crum		§	
	Appellees	§	

AGREED MOTION TO EXTEND TIME TO FILE APPELLANT'S BRIEF

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Ralph Lyle Crum, Appellant herein, and joined by Appellees, and would show the Court as Follows:

1. The Appellant's Brief was due Tuesday, September 22, 2009. Counsel for the Debtor is out of town on vacation and was unable to file the Brief on September 22, 2009, due to inability of the hotel's computer system to allow the download of necessary e-mails and problems with the hotel's internet access which caused the Appellant's Brief to be filed on September 23, 2009, at 12:56 a.m.
2. The parties agree that a one hour extension until September 23, 2009, at 1:00 a.m., to file the Appellant's Brief would be acceptable.

Respectfully submitted,

NORTHERN LAW FIRM
112 W. 8th Ave., Suite 400
Amarillo, Texas 79101
Tel. (806) 374-2266
Fax. (806) 374-9535

/s/ Van W. Northern
Van W. Northern
State Bar No. 15101100
Attorney for Appellant

CERTIFICATE OF CONFERENCE

Counsel for Appellant discussed this Motion with opposing counsel for Randi Crum and Kent Ries Trustee, who are not opposed to this Motion.

/s/ Van W. Northern
Van W. Northern

CERTIFICATE OF SERVICE

The undersigned certifies that he has on the date shown below transmitted a true copy of the foregoing document to the following parties in interest by electronic notification via the court's electronic case filing system or by regular mail on the 23 day of September, 2009:

Kent D. Ries
600 S. Tyler, Suite 1300
Box 12058
Amarillo, Texas 79101
Chapter 7 Trustee

U. S. Trustee
1100 Commerce Street, Room 9C60
Dallas, Texas 75242

Cole Young
Templeton, Smithee, Hayes,
Heinrich & Russell, L.L.P.
P.O. Box 15010
Amarillo, Texas 79105
Attorney for Randi Crum

/s/ Van W. Northern
Van W. Northern